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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT JUNEAU**

MYRNA I. JOHNSON,

Plaintiff,

vs.

FRED MEYER STORES, INC., and  
JAIME SAN MIGUEL,

Defendants.

Case No. J-04-008 CV (RRB)

**PLAINTIFF'S REQUEST THAT THE COURT INCLUDE ALASKA PATTERN JURY  
INSTRUCTIONS 20.20A & 20.20B PLUS 20.20C SPECIAL VERDICT FORM**

Plaintiff requests that in preparing jury instructions, the Court include in the set to be given to the jury, Alaska Pattern Jury Instruction 20.20A - Liability for Punitive Damages [Actions Accruing on or after August 7, 1997] (1999); 20.20B - Amount of Punitive Damages Award [Actions Accruing on or after August 7, 1997] (2003); and 20.20C Special Verdict Form - Punitive Damages (2003).

DATED this 1<sup>st</sup> day of October, 2007 at Juneau, Alaska.

Respectfully submitted,  
CHOATE LAW FIRM LLC

s/Mark Choate

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**PROOF OF SERVICE**

STATE OF ALASKA, FIRST JUDICIAL DISTRICT AT JUNEAU

I am employed in the City and Borough of Juneau, State of Alaska.. I am over the age of 18 and not a party to the within action. My business address is 424 N. Franklin Street, Juneau, AK 99801.

On October 1, 2007, I served the foregoing document described as ***PLAINTIFF'S REQUEST THAT THE COURT INCLUDE ALASKA PATTERN JURY INSTRUCTIONS 20.20A & 20.20B PLUS 20.20C SPECIAL VERDICT FORM***, on the interested parties in this action by serving the original true copies, addressed as follows:

Jim Dickens  
Miller Nash LLP  
4400 Two Union Square  
601 Union Street  
Seattle, WA 98101-2352

Peter Gruenstein  
Gruenstein & Hickey  
500 L Street, Suite 401  
Anchorage, AK 99501

☐ By mail, I deposited such envelope(s) in the mail at Juneau, Alaska, with postage thereon fully prepaid.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Juneau, Alaska, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ By personal service, I delivered such envelope(s) by hand to the ☐ office(s); ☐ the court box of the addressee(s).

☐ By facsimile, I transmitted such documents from Juneau, Alaska, to the offices of the addressee(s).

☐ By email, I transmitted such documents from Juneau, Alaska, to the email address of the addressee(s).

☒ By electronic service through the court of record's electronic service system,.

☐ (State) I declare under penalty of perjury under the laws of the State of Alaska that the foregoing is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

Executed on October 1, 2007 at Juneau, Alaska.

s/ Anya Ritchie  
CHOATE LAW FIRM, LLC  
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